

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION**

ENERGY AND POLICY INSTITUTE,

Plaintiff,

v.

TENNESSEE VALLEY AUTHORITY,

Defendant.

No. 3:22-cv-00220-TAV-DCP

**EPI'S MOTION FOR ATTORNEY FEES AND COSTS**

Plaintiff Energy and Policy Institute (“EPI”) respectfully moves this Court to grant EPI reasonable attorney fees and other litigation costs pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(a)(4)(E). For the reasons set forth in the accompanying Memorandum as well as the attached declarations and exhibits, EPI is both eligible for and entitled to attorney fees and costs according to the guidelines of FOIA, and EPI is requesting a reasonable amount of fees based on the lodestar, calculated as “the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983).

Dated November 18, 2024

Respectfully submitted,

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